



JEANA CHAIRESS CPT

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA

WILLIAM RAY SPRAY, JR., and )  
RHONDA JEAN SPRAY, Individually )  
and as Personal Representatives )  
of the ESTATE OF SINDI LUCILLE )  
SPRAY, Deceased, )

Plaintiff(s), )

-vs- )

Case No. CIV-20-1252-C

BOARD OF COUNTY COMMISSIONERS )  
OF OKLAHOMA COUNTY, in its )  
Official Capacity as Governing )  
Body of the County of Oklahoma )  
County, )

Defendant(s) . )

DEPOSITION OF JEANA MARIE CHAIRESS, CPT

TAKEN ON BEHALF OF THE PLAINTIFF(S)

IN OKLAHOMA CITY, OKLAHOMA

ON SEPTEMBER 21, 2022

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REPORTED BY: LESLIE A. FOSTER, RPR

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1 Exhibit 11, did you create anything else?

2 **A** No, sir.

3 **Q** On your report, Exhibit 11, I noted this on  
4 many of the reports. Do you see where it says "Did  
5 injury occur?"

6 **A** Yes.

7 **Q** It says "No." That's not really accurate, is  
8 it?

9 **A** No.

10 **Q** And where it says "Were there any witnesses,"  
11 and it says "No," that's not really accurate, is it?

12 **A** No.

13 **Q** And when it says "Was there any evidence," and  
14 it says "No," that's not really accurate, is it?

15 **A** I mean, it could go both ways. I mean, if  
16 there wasn't anything found, there wouldn't be evidence.  
17 It depends on how you -- I mean, but, no.

18 **Q** Are those just preset on the template before  
19 you fill this in? I mean, are the noes already preset,  
20 or did you fill it in to say no?

21 **A** I'm not positive, but I think they are preset.

22 **Q** I'm going to ask you about a different subject.  
23 We have looked through some log sheets. They're actually  
24 over there to your right. But my question is this, many  
25 times on these log sheets, it says "Sight checks 1-50."

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1 Are you familiar with that type of entry?

2 **A** Yes, sir.

3 **Q** Was it jail policy or custom to have log sheets  
4 just filled in sight check 1 to 50 without being specific  
5 as far as when each specific cell was being sight  
6 checked?

7 **A** Correct. They normally just put sight check  
8 Cells 1 through 50, what time you enter the pod and  
9 start, and then what time you finish.

10 **Q** That's the way it was done? Was that by a  
11 written policy, or was that just the custom that was  
12 happening?

13 **A** To write Cells 1 through 50, I believe it's  
14 both.

15 **Q** You think it's in writing?

16 **A** I don't think the policy specifies to write the  
17 time of each time -- each cell you look at to write the  
18 time.

19 **Q** Are you telling me the policy does not specify  
20 to write it down, or does the policy say "Don't write it  
21 down"?

22 **A** I don't think it specifies.

23 **Q** Do you think it addresses sight checks at all?  
24 Do you think there is a policy that deals with sight  
25 checks?

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1           **A**     Yes, there is one.

2           **Q**     How -- how long does it take to conduct a sight  
3 check for any one cell?

4           **A**     For any one cell? At least 5 to 10 seconds.

5           **Q**     How many cells are there in a pod?

6           **A**     50.

7           **Q**     And if it's 10 seconds, that's 500 seconds,  
8 isn't it?

9           **A**     Uh-huh.

10          **Q**     Is that correct?

11          **A**     Correct.

12          **Q**     And if it's 5 seconds, that's 250 seconds.  
13 Right?

14          **A**     Yes.

15          **Q**     5 times 50?

16          **A**     Yeah.

17          **Q**     And if it's 5 seconds, 250, my little  
18 calculator says that's 4.17 minutes. And if it's 10  
19 seconds each, which is about -- I think you said 500  
20 seconds, my calculator says that that's 8.3 minutes. And  
21 would it be more likely that some are 5 seconds and some  
22 are 10 seconds as opposed to all being 5 seconds and all  
23 being 10 seconds?

24          **A**     Correct.

25          **Q**     So if half of them were 5 seconds and half of

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1     them were 10 seconds, trust my math, that'd be 375  
2     seconds. According to my calculator, that'd be 6  
3     minutes, 6.25 minutes. So it would not be logical that  
4     the 1 to 50 sight checks can be done in three minutes.  
5     Correct?

6           A     Correct.

7           Q     And when you said, in answering my question,  
8     that it takes 5 to 10 seconds to conduct a sight check,  
9     what happens during that 5 to 10 seconds?

10          A     You're supposed to look for movement and if  
11     they're not moving, sleeping, you make sure that they're  
12     breathing.

13          Q     And if you're looking in and they look like  
14     they're sleeping, I take it sometimes they might have a  
15     cover on. And if you don't see any movement, what do you  
16     do?

17          A     I open the door.

18          Q     You said you open the door, but is there a  
19     directive or policy from the jail as to what you're  
20     supposed to do? Let me start with written policy. Is  
21     there a written directive on what you're supposed to do  
22     if you don't see movement and they're covered up?

23          A     I'm not positive it's -- if it's written, but I  
24     wanted to say that it does state that you have them do  
25     some sort of movement.

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1 Q Does that mean you have to enter the cell?

2 A No. You can open the door or if you know the  
3 individual's name, then you can knock on the door and ask  
4 them and then whenever I did it, most of them would move  
5 their foot or their hand or wave at me or something to  
6 let me know.

7 Q But if all else fails, you have to enter?

8 A Correct.

9 Q Now, what you just told me is what happens  
10 during the 5 to 10 seconds. Correct?

11 A Yes.

12 Q After that 5 to 10 seconds is done, you have to  
13 go to another cell. Right?

14 A Correct.

15 Q I'm not going to suggest that you have to walk  
16 a block to the next cell, but you have to go somewhere,  
17 don't you? Don't you have to move from one place to  
18 another?

19 A Yes.

20 Q Does that take a little bit more time?

21 A I mean, the -- the doors are pretty close  
22 together, so it's just --

23 Q But you have to move from one to another?

24 A Correct.

25 Q At least one second from one door to the other?

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1           **A**     Probably.

2           **Q**     There's 50 doors. Right?

3           **A**     Correct.

4           **Q**     25 of them are on an upper tier and 25 below?

5           **A**     Correct.

6           **Q**     Sometimes you have to walk up and down the  
7 stairs, then, don't you?

8           **A**     Correct.

9           **Q**     That adds a little time to the process itself,  
10 does it not?

11          **A**     Correct.

12          **Q**     Because, unfortunately, there's just one of you  
13 doing it. Right?

14          **A**     Correct.

15          **Q**     Generally speaking, there are not two rovers on  
16 a floor. Correct?

17          **A**     Not generally, no.

18          **Q**     You have heard -- strike that.

19                 Do you think the jail is properly staffed in  
20 terms of numbers?

21          **A**     No, sir.

22          **Q**     It needs more people, doesn't it?

23          **A**     Correct.

24          **Q**     That's been true for a long time. Right?

25          **A**     Correct.

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1           **Q**     Back in December of 2018, that was true.  
2     Correct?

3           **A**     Yes.

4           **Q**     Was it also in need of medical personnel back  
5     then?

6           **A**     I --

7           **Q**     In terms of staffing?

8           **A**     -- don't know their numbers.

9           **Q**     If you don't know, that's fine.

10          **A**     I don't.

11          **Q**     Did you become aware that in May of 2021, that  
12     Turnkey threatened to walk out and quit if they didn't  
13     get more budget and staff in?

14          **A**     Yes.

15          **Q**     You heard that?

16          **A**     I did hear that.

17          **Q**     Did you ever hear back in 2014 or '15 that  
18     Armor sued the County for over \$3 million that they  
19     hadn't been paid?

20          **A**     I don't recall that one.

21          **Q**     If an inmate, detainee, upon medical evaluation  
22     is supposed to be placed on suicide watch, how is that  
23     communicated, if at all, to the detention staff?

24          **A**     For suicide watch, it is communicated because  
25     they are placed in a green smock and on specific floor.



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1           **Q**     How does that communication happen? How does  
2     it -- how does it -- the information get from the medical  
3     person to the detention staff?

4           **A**     When they take the -- the form that they have,  
5     the classifications, it's noted on the form that they're  
6     being placed on suicide precaution. And then they find  
7     them a cell. And then once that individual is taken  
8     upstairs, it's communicated with that officer.

9           **Q**     When you say "upstairs," does that mean -- what  
10    does that mean?

11          **A**     Oh, I'm sorry, from the first floor to the  
12    13th floor.

13          **Q**     That's from receiving?

14          **A**     Correct.

15          **Q**     Okay. And then is it verbally communicated --

16          **A**     Yes.

17          **Q**     -- to the -- to the person on whichever floor  
18    it is?

19          **A**     Yes. And it's written on their form that they  
20    bring up.

21          **Q**     In a suicide watch situation, does that  
22    increase the number of sight checks?

23          **A**     Correct.

24          **Q**     And is it 15 minutes?

25          **A**     Correct.

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1           **Q**     If you are conducting a sight check on any one  
2 person every 15 -- strike that.

3                     If you're not on suicide watch, sight checks  
4 are just happening, how often are sight checks supposed  
5 to happen?

6           **A**     On the regular floors, it's once every hour.

7           **Q**     Is six considered a regular floor?

8           **A**     Yes.

9           **Q**     But 6 could also be a place where somebody  
10 would be on suicide watch?

11          **A**     No.

12          **Q**     Where would suicide watch happen?

13          **A**     Suicide watch will -- they were on 12, but  
14 they're moved up to 13.

15          **Q**     Back in December of 2018, where would that have  
16 happened?

17          **A**     It would have been 13.

18          **Q**     Okay. Either way, it wouldn't have been 6?

19          **A**     No.

20          **Q**     And if the person is on suicide watch and taken  
21 to 13, somebody's going to look in every 15 minutes?

22          **A**     Yes. And somebody would be sitting outside the  
23 door.

24          **Q**     If somebody is on suicide watch, then that  
25 person is at least going to be observed four times as

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1 much as if they're not on suicide watch?

2 **A** Correct.

3 **Q** And by that, I mean incrementally. As you  
4 said, every 15 minutes as opposed to once per hour.

5 **A** Correct.

6 **Q** If upon medical examination, an inmate or  
7 detainee, I should say, is labeled to need urgent mental  
8 health care -- are you familiar with the concept?

9 **A** Yes, sir.

10 **Q** -- what is supposed to happen?

11 **A** They would go to the mental health floor and  
12 they -- the nursing staff should put a task in for them  
13 to be seen by mental health.

14 **Q** How long -- well, strike that.

15 That would typically -- would that typically  
16 happen in receiving where that evaluation is done, or is  
17 that evaluation done after they go to a floor?

18 **A** It's in receiving.

19 **Q** After that happens and if somebody is  
20 designated to have -- need urgent mental evaluation, then  
21 that person should go to -- did you say 12?

22 **A** 12 or 13.

23 **Q** Would that have been the case in December of  
24 2018 also, to go to one of those two floors?

25 **A** Yes, sir.

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1           **Q**     Would receiving have kept the person for any  
2     amount of time? I don't mean, like, a couple of minutes,  
3     but would they keep them for hours before they move them  
4     to 12 or 13?

5           **A**     I believe they would, just for housing issues.

6           **Q**     That it might take hours?

7           **A**     Yes.

8           **Q**     If the person has the -- if it's labeled or  
9     instructed urgent mental health evaluation, whatever they  
10    called it, what's their move and what would happen?

11          **A**     They would just be placed up on the floor. The  
12    sight checks are every 30 minutes. And the medical staff  
13    downstairs would have put a task in to be seen by mental  
14    health the next day.

15          **Q**     If you were checking a person every 15 minutes,  
16    the likelihood of seeing a person in physical distress is  
17    more likely than if you're just looking at them once  
18    every hour. Does that make sense?

19          **A**     Yes.

20          **Q**     And if you're looking at them once every  
21    30 minutes as opposed to once every hour, would it still  
22    increase the chances of catching that person who's having  
23    physical distress to -- strike that. That's a bad -- bad  
24    question.

25                 If you're looking in on them once every

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1 30 minutes, is the likelihood of seeing a person who's in  
2 physical distress, is it -- is that likelihood increased  
3 as opposed to if you're just watching them once every  
4 hour?

5 **A** Correct.

6 **Q** When you exited the cell where Sindi Spray  
7 was -- let's see if it tells us when you left. Does your  
8 report tell us when you exited?

9 **A** Not the time, no.

10 **Q** Well, let me -- here's what I want to ask you.  
11 At the time you exited, what was her condition? What was  
12 Sindi Spray's condition as far as you could tell?

13 **A** From best I can remember, she wasn't breathing.

14 **Q** Okay. Had EMSA arrived when you left?

15 **A** No. When medical staff enters, they take over,  
16 and then I called.

17 **Q** But I just want to know if you stayed. I know  
18 it says you had to go do some other stuff, but EMSA  
19 hadn't made it there by the time you physically left the  
20 cell? And it's not a trick question. I just want to  
21 know if they were there or not.

22 **A** Not the time when she took over, the nursing  
23 staff. Excuse me.

24 **Q** She, Nurse Shirley Reisch?

25 **A** Yes.